

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

ANDREW ALEXANDER, et al.,  
on behalf of themselves and all  
others similarly situated

Plaintiffs,

vs.

Civil Action No. 4:20-cv-00021-SA/JMV

PELICIA E. HALL, et al.,

Defendants.

---

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
EXCLUDE THE EXPERT TESTIMONY OF LENARD VARE (ECF No. 166)**

NOW COME Plaintiffs, Andrew Alexander, *et al.*, by and through their counsel, Oliver Law Group, P.C. and Calderon and Williams, and file this Response in Opposition to Defendants' Motion to Exclude the Expert Testimony of Lenard Vare (ECF No. 166).

In support, Plaintiffs rely on their accompanying memorandum in support and the following exhibits:

**Exhibit 1** – *United Servs. Auto Ass'n v. Wells Fargo Bank, N.A.*, No. 2:18-cv-00366 (E.D. Tex. Dec. 18, 2019)

For the reasons stated in the accompanying memorandum, Plaintiffs respectfully request that this Court deny Defendants' Motion (ECF No. 166).

Respectfully submitted,

/s/ Paul Matouka  
Paul Matouka \*(MI State Bar# P84874)  
Oliver Law Group, P.C.  
*Attorneys for Plaintiff*  
50 W. Big Beaver Rd.  
Suite 200

Troy, MI 48084  
T: (248) 327-6556  
F: (248) 436-3385  
E: notifications@oliverlawgroup.com  
\*Admitted Pro Hac Vice

/s/ Arthur Calderon  
Arthur Calderon (MSB# 103917)  
Calderon & Williams  
*Attorneys for Plaintiff*  
7716 Old Canton Rd.  
Suite C  
Madison, MS 39110  
T: (662) 594-2439  
E: arthur@msdeltalaw.com

**CERTIFICATE OF SERVICE**

I, Paul Matouka, hereby certify that on January 9, 2024, I filed the foregoing document using the Court's CM/ECF filing system which will cause a copy to be served on all counsel of record.

/s/ Paul Matouka

Paul Matouka \*(MI State Bar# P84874)